III.   REMARKS

Claims 1-9 are pending in this application. By this Amendment, each of claims 1, 7, and 9 has been amended. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

In the Office Action, claims 1-9 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,134,550 to Van Oorschot *et al.* Applicants assert that the Office has misinterpreted one or both of Van Oorschot *et al.* and the present application.

The Office alleges that Van Oorschot *et al.* teach "filtering at least one certificate authority." Office Action at 2 (internal citations omitted). In support of this allegation, the Office cites the following passages of Van Oorschot *et al.*:

> In another alternative embodiment, the certificate chain response signal 404 may include response data, such as the necessary certificates themselves, instead of or in addition to names of the CA in a complete shortest certificate chain. The certificates may be stored as the certificate chain data in the storage medium 208 so that the certificate validating unit need not perform the conventional access operation to the distributed directory 302. Hence, the certificate chain data generator 400 stores, for use by a certificate validation unit, the certificate chain data representing CA-certificates and cross-certificates that form the preferred certificate chain to facilitate validation of the certificate to be validated.

> Van Oorschot *et al.,* col. 9, ll. 15-27.

Alternatively, if desired, corresponding certificate data itself for each certificate of each of the CA's may also be stored as part of the certificate chain data and sent to the subscriber to further reduce the processing requirement by the subscriber.

Van Oorschot *et al.*, col. 11, ll. 39-43.

Applicants respectfully assert that nothing in the above passages, nor any other portion of Van Oorschot *et al.* teaches filtering certificates using <u>one</u> or more certificate authorities. Such an interpretation is, in fact, contrary to the clear language of Van Oorschot *et al.* For example, Applicants note the following passages of Van Oorschot *et al.*:

A method and apparatus constructs a preferred certificate chain, such as <u>a list of all certificate authorities in a shortest trusted path, based on generated certificate chain data, such as a table of trust relationships among certificate issuing units</u> in a community of interest...

Van Oorschot *et al.*, Abstract (emphasis added).

Certificate chains correspond to directed trust paths, also known as certification paths, such as trust relationships among certification authorities <u>where at least one certification authority (CA) has certified another certification authority</u>.

Van Oorschot *et al.*, column 2, lines 22-26 (emphasis added).

As the above passages make clear and as explained in Applicants' earlier Responses, the filtering method of Van Oorschot *et al.* requires <u>at least two</u> certificate authorities. Specifically, as defined above, the certificate chains of Van Oorschot *et al.* represent relationships between certificate authorities. Thus, Applicants assert that the passages of Van Oorschot *et al.* cited by the Office do not teach a method for filtering certificates issued from <u>one</u> or more certificate authorities. In both structure and

function, <u>the method of Van Oorschot *et al.* requires at least two certificate authorities</u> and is therefore narrower in scope than the claims of the present invention.

The Office goes on, however, to allege that "even if Van Oorschot as applicant interprets, would only teach two or more certificate authorities, still it clearly reads on the claim limitation because <u>two certificate authorities</u> is "**at least one** certificate authority" and could be included in "**at least one** certificate authority." Office Action at 2 (emphasis in original).
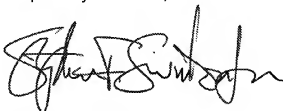
In order to remove any basis for confusion and to facilitate early allowance of the pending claims, each of claims 1, 7, and 9 has been amended to recite "as few as one" certificate authority rather than "at least one" certificate authority, as previously amended. As explained above, the method of Van Oorschot *et al.* requires at least two certificate authorities.

Applicants assert, therefore, that Van Oorschot *et al.* clearly do not teach a method for filtering certificates issued from as few as one certificate authority and do not, therefore, anticipate either of claims 1 or 7, as amended. As each remaining rejected claim depends from claim 1 or claim 7, Applicants assert that Van Oorschot et al. do not anticipate any of the pending claims.

Finally, Applicants reassert the remaining arguments contained in their 20 July 2005 Response as further evidence of Van Oorschot *et al.*'s failure to anticipate any of the rejected claims.

In view of the foregoing, Applicants respectfully requests withdrawal of the rejection and allowance of the application. Should the Examiner require anything further from Applicants, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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